



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

December 21, 2009

Mr. Stephen Quigley
Conestoga-Rovers & Associates
651 Colby Drive
Waterloo, Ontario, Canada
N2V 1C2



RE: Proposed Reduction in Parameters for Groundwater Sampling
South Dayton Dump and Landfill Site, Moraine, Ohio

Dear Mr. Quigley:

The United States Environmental Protection Agency (EPA) has reviewed Conestoga-Rovers & Associates (CRA's) December 16, 2009 proposal to limit groundwater sampling parameters for the December 2009 groundwater sampling event at the South Dayton Dump and Landfill Site to Target Compound List (TCL) volatile organic compounds (VOCs), Target Analyte List (TAL) metals and MNA parameters.

CRA's basis for not analyzing the December 2009 groundwater samples for TCL semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides and herbicides, is that these compounds have not been detected above Regional Screening Level (RSL) Maximum Contaminant Levels (MCLs) during previous groundwater sampling events.

EPA has reviewed CRA's proposal and cannot approve CRA eliminating analytical parameters from the December 2009 groundwater sampling event as discussed below:

1. Some of the wells being sampled in December 2009 are new wells that have never been sampled (MW-210A, MW-210B, MW-26, MW-27, MW-28, MW-P219, and the existing wells at Dayton Power and Light). These wells should be sampled for all parameters: TCL VOCs, SVOCs, PCBs, pesticides, herbicides and TAL metals.
2. MCLs are not RSL values and should not be used as screening criteria. MCLs are drinking water standards established under the Safe Drinking Water Act.

TABLE 1**CHEMICALS DETECTED IN GROUNDWATER MONITORING WELLS ABOVE
REGIONAL SCREENING LEVELS (RSLs) 2008-2009****South Dayton Dump and Landfill Site
Moraine, Ohio**

Chemical	RSL (ug/L)	Detected Concentration (ug/L)	Location	Date
SVOCs				
Napthalene	0.14	1.6	Valley Asphalt Well 2	9/2008
		17	MW-215A	7/2009
PCBs				
Aroclor-1242	0.034	0.19	MW-202	7/2009
Aroclor-1254	0.034	0.19	MW-215A	7/2009
Aroclor-1260	0.034	0.16	MW-202	7/2009
		0.19	MW-204	7/2009
Pesticides				
Alpha-BHC	0.01	0.034	MW-215A	7/2009